

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

The Development of Operational, Technical)
And Spectrum Requirements For Meeting))WT Docket No. 96-86
Federal, State and Local Public Safety Agency)
Communications Requirements Through the)
Year 2010)

**COMMENTS OF
On behalf of the Region 24 (State of Missouri)
Regional Planning Committee**

The Region 24 (State of Missouri) Regional Planning Committee (RPC), provides comment of the migration to a 6.25 KHz Voice Efficiency Requirement stated in FCC 02-216 Fifth Report and Order.

The RPC supports the efficient implementation of 700 MHz public safety spectrum. The RPC agrees with the Commission that a hard date for migration to 6.25 KHz will provide notice to all users that compliance dates have been established and allow for agencies to establish migration plans to the more efficient 6.25 KHz operating bandwidth.

As the Commission noted in the Fifth Report and Order, the requirement for agencies to purchase dual mode equipment after December 31, 2006 allows for “forward compatibility” and promotes inter-agency communication. Dual mode capability will allow pre 2007 licensees to interact with newer licensees that are restricted to utilizing only 6.25 KHz equipment and will provide a “bridge” between “legacy licensees” and newer 700 MHz licensees. The additional costs associated with the dual mode functionality are a minimal price to pay for increased interoperability.

Lastly, the Region 24 Regional Planning Committee encourages the Commission to consider the need for existing 800 MHz licensees to expand their systems with new 700 MHz public safety spectrum. As dual band 700 MHz/800 MHz subscriber equipment is already available in the marketplace, the concept of supplementing existing systems with this new, important spectrum is one that will have an application in both of Region 24’s metropolitan areas of St Louis and Kansas City.

As 800 MHz public safety spectrum and its channelization is currently the topic of another proceeding, we would encourage the Commission to

acknowledge the potential for existing 800 MHz systems operating at 12.5 KHz to expand their channel allotments with 12.5 KHz 700 MHz channels. This is particularly important within Region 24, as 700 MHz spectrum is available and the region is clear of incumbent broadcasters. The existing 800 MHz systems in Region 24 will be able to access the spectrum sooner than other agencies throughout the country.

We request accommodations be made to allow existing licensees to utilize the spectrum available to them when needed without having to redesign or replace their existing systems on a case by case basis.

Date March 31, 2003

Name	Stephen T. Devine
Title	Chairperson
Agency	Region 24 RPC
Address	619 # 2 Woodlander, Jefferson City Missouri 65101
Phone Number	573 526 6105